REMARKS

The Office Action dated June 2, 2005 contained a final rejection of claims 1-6. The Applicant has amended claims 1, 2, 4, and 6. Claims 1-6 are in the case. Please consider the present amendment with the attached Request for Continued Examination (RCE) under 37 C.F.R. § 1.114. This amendment is in accordance with 37 C.F.R. § 1.114. Reexamination and reconsideration of the application, as amended, are requested.

The Office Action rejected claims 1 and 5-6 under 35 U.S.C. 103(a) as allegedly being unpatentable over Peng (U.S. Patent No. 6,252,671) in view of Bennett (U.S. Patent No. 5,144,330). Also, the Office Action rejected claims 2-4 under 35 U.S.C. 103(a) as allegedly being unpatentable over Peng (U.S. Patent No. 6,252,671) in view of Bennett (U.S. Patent No. 5,144,330) and further in view of Morse et al. (U.S. Patent No. 5,590,260).

The Applicant respectfully traverses these rejections based on the amendments to the claims and the arguments below.

First, Peng in combination with Morse et al. and Bennett do not disclose all of the Applicant's claimed elements. For example, Peng in combination with Morse et al. and Bennett disclose determining whether a character set associated with the font can be represented in a byte and determining whether the number of glyphs in the font is below a threshold (Peng et al.), increasing efficiency in the display of characters on a display within a data processing system (Morse et al.), and using a printer program to alter the font (Bennett). In contrast, among other things, clearly, the combined cited references do not disclose, teach, or suggest the Applicant's reconstruction being performed during rendering of the text to allow different effects to be applied to each individual glyph.

Specifically, regarding claims 1 and 6, with regard to Peng et al., the Examiner referred to col. 2 , lines 28-29 and col. 2, lines 32-34, and stated that Peng et al. disclosed a method of breaking apart the glyphs into one or more parts and then stitching them back together. However, the Applicant respectfully submits that Peng et al. disclose braking apart and recombining glyphs in a completely different context from the claimed invention and is missing the Applicant's reconstruction being performed during rendering of the text to allow different effects to be applied to each individual glyph.

4

Namely, Peng et al. discloses the transfer of glyph data forming a complete font (255 characters) to a printer to allow the printer to use that font to render an incoming stream of ASCII (1 byte) characters. The breaking apart and stitching together of glyphs disclosed in Peng et al. is **not** performed during the actual rendering of the characters, like the Applicant's claimed invention. For instance, Peng et al. in col. 2, lines 21-34 discloses determining whether a character set associated with the font can be represented as a byte and if so, the font is downloaded to the output device using a first format. Otherwise, the apparatus in Peng et al. determines whether the number of glyphs in the font is below a threshold such as 2^{14} (16K) glyphs, and if so, the font is downloaded to the output device using the page description download format. If not, the apparatus breaks the font glyph data into one or more blocks of glyph data, where each have fewer glyphs than the threshold. However, unlike the Applicant's claimed invention, once the glyphs have been broken into small blocks, the apparatus downloads the blocks to the output device using the page description language download format (see col. 2, lines 20-45 of Peng et al.). Instead, the Applicant's claimed invention reconstructs during rendering of the text to allow different effects to be applied to each individual glyph, which is not disclosed by Peng et al.

Next, regarding Morse et al., although the Examiner stated that Morse et al. disclose adding an addressable color to a glyph, in light of the amendment to claim 2, the Applicant respectfully submits that Morse et al. does not disclose all of the features of the claimed invention. In particular, Morse et al. in col. 11, lines 32-41 disclose a method of storing the monochrome (on/off) pixel data separate from the color data and how the data is combined before it is displayed, where the color data is the character color, and background color. However, nowhere in Morse et al. is the Applicant's claimed adding an addressable color to the at least one constituent piece of the individual glyph (claim 2). It should be noted that characters in the claimed invention can be comprised of multiple glyphs, with each having a different color, texture or pattern.

Regarding claim 4, although the Examiner stated that Morse et al. disclose adding a pattern to the glyph, in light of the amendment to claim 4, the Applicant respectfully submits that Morse et al. does not disclose all of the features of the claimed invention. In particular, Morse et al. in col. 6, lines 25-28 disclose the actual raster

pattern for a font character, in this case an 'A'. For example, Morse et al. is using the word 'pattern' to mean the pattern of rasterized pixel elements for the letter 'A' in an uncolored and otherwise undecorated state. In other words, Morse et al. is using the pattern for the original unmodified character, and not the addition of a pattern to individual glyphs, like the Applicant's claimed invention. Referring to paragraph [0030] of the Applicant's published patent application, 'pattern' refers to an actual pattern (i.e., straight lines, cross-hatched lines, dots) that gets applied to the glyph to modify its appearance. Consequently, the **failure** of the cited references, either alone or in combination, to <u>disclose, suggest or provide motivation</u> for the Applicant's claimed invention indicates a lack of a prima facie case of obviousness, and thus, the Applicant respectfully requests withdrawal of the rejections.

With regard to the dependent claims, because they depend from the above-argued respective independent claims, and they contain additional limitations that are patentably distinguishable over the cited references, these claims are also considered to be patentable (MPEP § 2143.03).

As such, it is respectfully requested that all of the claims be allowed based on the amendments and arguments. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. Additionally, in an effort to further the prosecution of the subject application, the Applicants kindly request the Examiner to telephone the Applicants' attorney at **(818) 885-1575** if the Examiner has any questions or concerns. Please note that all correspondence should continue to be directed to:

Hewlett Packard Company
Intellectual Property Administration
P.O. Box 272400
Fort Collins, CO 80527-2400

Respectfully submitted,
Dated: September 2, 2005

Edmond A. DeFrank
Reg. No. 37,814
Attorney for Applicants
(818) 885-1575 TEL
(818) 885-5750 FAX